

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MARIA JOSE PIZARRO

Plaintiff/Counterclaim
Defendant

v.

EUROS EL TINA RESTAURANT LOUNGE
AND BILLIARDS CORP., SANTIAGO
QUEZADA, SANTIAGO QUEZADA JR.Defendants/Counterclaim
Plaintiffs/Third-Party
Plaintiffs

v.

EMITON FERNANDEZ, NARCISO GOMEZ,
JOSE E. CASTRO, TOMAS ANDRES
PIZARRO ZEPEDA, ELADIO CASTRO
PRODUCTIONS INC., ZOILIMAR MEJIA,
Third-Party Defendants

1:20-cv-05783-AKH

**NOTICE OF MOTION
TO APPOINT RECEIVER**

PLEASE TAKE NOTICE that the plaintiff Maria Jose Pizarro moves this Court before the Honorable Alvin K. Hellerstein at the United States Courthouse, 500 Pearl Street, New York, NY 10007, for an Order, pursuant to CPLR 5228, made applicable pursuant to FRCP 64 and 66:

- Appointing a receiver over all real property owned by defendant Santiago Quezada (“Mr. Quezada”) located in the Dominican Republic, including that identified in his bankruptcy schedules and Exhibit 3 to the accompanying declaration, Mr. Quezada’s 2020 Mercedes Benz GLS located in the Dominican Republic and his 100% ownership interest in El Tina Fish Market Corp. (together, the “Property to be Received”).
- Directing Mr. Quezada to promptly transfer title to all Dominican real property constituting Property to be Received, and title and keys to the 2020 Mercedes Benz vehicle constituting Property to be Received to the receiver, so that the receiver can sell the same.
- Directing Mr. Quezada to turn over to the receiver all stock shares and/or certificates he holds in El Tina Fish Market Corp. so that the receiver can sell the shares, or collect

Mr. Quezada's future distributions, dividends and/or profits from El Tina Fish Market Corp.

- Directing Mr. Quezada, if the aforementioned certificates of El Tina Fish Market Corp. stock are missing or unavailable, to execute and deliver (consistent with CPLR 5225(c)) to the receiver, replacement stock certificates, a lost stock affidavit and/or any other instrument necessary to effectuate delivery of the stock to the receiver.
- Directing the receiver to distribute proceeds of the sale of the Property to be Received to Mr. Quezada's judgment creditors, according to the priority determined by this Court.
- Authorizing the receiver to employ Dominican counsel, for the purpose of enforcing the receiver's order of appointment within the Dominican Republic.
- Granting such other and further relief as this Court deems just and proper.

Dated: New York, NY
June 10, 2025

Amini LLC

/s/ Jeffrey Chubak
Jeffrey Chubak
131 West 35th Street
12th Floor
New York, NY 10001
(212) 490-4700
jchubak@aminillc.com

Evan Brustein
Brustein Law PLLC
299 Broadway
17th Floor
New York, NY 10007
(212) 233-3900
evan@brusteinlaw.com
Attorneys for Judgment Creditor Maria Jose Pizarro